

Item 1: Cover Page

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March 12, 2020

This brochure provides information about the qualifications and business practices of Halter Ferguson Financial, Inc. If you have any questions about the contents of this brochure, please contact us at 317-875-0202 or info@hffinancial.com. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Halter Ferguson Financial, Inc. is a registered investment adviser. Registration of an investment adviser does not imply any level of skill or training.

Additional information about Halter Ferguson Financial, Inc. also is available on the SEC's website at www.adviserinfo.sec.gov. You can search this site by a unique identifying number, known as a CRD number. Halter Ferguson Financial, Inc.'s CRD number is 109563.

Item 2: Summary of Material Changes

There have been material changes since the February 13, 2019 Form ADV filed on the IARD system as follows:

Effective February 9, 2020, Scott Ferguson has passed away and Bradford Ferguson has become the sole shareholder of Halter Ferguson Financial, Inc.

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Item 4: Advisory Business

Halter Ferguson Financial, Inc. ("Halter Ferguson Financial") was founded in Indianapolis, Indiana in 1986. The principal and sole shareholder is Bradford S. Ferguson, CFA.

Halter Ferguson Financial is a fee only financial planning and investment advisory firm that provides these services to individuals as well as businesses. These services are tailored to the individual needs of clients. Halter Ferguson Financial provides discretionary portfolio management services. The portfolio management clients give discretion to Halter Ferguson Financial to act in buying and selling securities, selection of the custodian, selection and retention of separate account managers, and transaction rates in managing the client's account. After developing an investment management policy with the client, Halter Ferguson Financial receives written authority by the client to buy and sell securities on behalf of the client within the stated parameters of that policy. Clients may impose in writing restrictions on investing in certain securities, types of securities or the sale of securities presently owned by the client. Financial planning services are described in the Halter Ferguson Financial, Inc. Financial Planning Engagement Agreement. This Agreement is provided to you before your first planning meeting and is also available on request.

We offer an automated investment program (the "Program") through which clients are invested in a range of investment strategies we have constructed and manage, each consisting of a portfolio of exchange-traded funds ("ETFs") and a cash allocation. The client may instruct us to exclude up to three ETFs from their portfolio. The client's portfolio is held in a brokerage account opened by the client at Charles Schwab & Co., Inc. ("CS&Co"). We use the Institutional Intelligent Portfolios® platform ("Platform"), offered by Schwab Performance Technologies ("SPT"), a software provider to independent investment advisors and an affiliate of CS&Co., to operate the Program. We are independent of and not owned by, affiliated with, or sponsored or supervised by SPT, CS&Co., or their affiliates (together, "Schwab"). We, and not Schwab, are the client's investment advisor and primary point of contact with respect to the Program. We are solely responsible, and Schwab is not responsible, for determining the appropriateness of the Program for the client, choosing a suitable investment strategy and portfolio for the client's investment needs and goals, and managing that portfolio on an ongoing basis. We have contracted with SPT to provide us with the Platform, which consists of technology and related trading and account management services for the Program. The Platform enables us to make the Program available to clients online and includes a system that automates certain key parts of our investment process (the "System"). The System includes an online questionnaire that helps us determine the client's investment objectives and risk tolerance and select an appropriate investment strategy and portfolio. Clients should note that we will recommend a portfolio via the System in response to the client's answers to the online questionnaire. The client may then indicate an interest in a portfolio that is one level less or more conservative or aggressive than the recommended portfolio, but we then make the final decision and select a portfolio based on all the information we have about the client. The System also includes an automated investment engine through which we manage the client's portfolio on an ongoing basis through automatic rebalancing and tax-loss harvesting (if the client is eligible and elects).

We charge clients a fee for our services as described below under *Item 5 Fees and Compensation*. Our fees are not set or supervised by Schwab. Clients do not pay brokerage commissions or any other fees to CS&Co. as part of the Program. Schwab does receive other revenues, including (i) the profit earned by Charles Schwab Bank, a Schwab affiliate, on the allocation to the Schwab Intelligent Portfolios Sweep Program described in the Schwab Intelligent Portfolios Sweep Program Disclosure Statement; (ii) investment advisory and/or administrative service fees (or unitary fees) received by Charles Schwab Investment Management, Inc., a Schwab affiliate, from Schwab ETFs™ Schwab Funds® and Laudis Funds® that we select to buy and hold in the client's brokerage account; (iii) fees received by Schwab from third-party ETFs that participate in the Schwab ETF OneSource™ program and mutual funds in the Schwab Mutual Fund Marketplace® (including certain Schwab Funds and Laudus Funds) in the client's brokerage

account for services Schwab provides; and (iv) remuneration Schwab may receive from the market centers where it routes ETF trade orders for execution.

We do not pay SPT fees for the Platform so long as we maintain \$100 million in client assets in accounts at CS&Co. that are not enrolled in the Program. If we do not meet this condition, then we pay SPT an annual licensing fee of 0.10% (10 basis points) on the value of our clients' assets in the Program. This fee arrangement gives us an incentive to recommend or require that our clients with accounts not enrolled in the Program be maintained with CS&Co.

On December 31, 2019, Halter Ferguson Financial had \$175,923,717 of assets under discretionary management, \$477,210 of assets under non-discretionary management for a total assets under management of \$176,400,927.

Item 5: Fees and Compensation

Halter Ferguson Financial's fees are stated in the Investment Management Agreement. The fee for discretionary portfolio management services is one percent (1%) annually of the assets under management and includes financial planning services. This fee is assessed in arrears, accrued daily, and billed quarterly at one-quarter of one percent (0.25%) of the value of the portfolio at the end of the quarter. There is a minimum account size of \$200,000 and a minimum fee of \$500 dollars per quarter. The fee for non-profit organizations is three quarters of one percent (0.75%) annually of the assets under management. All fees and minimums are negotiable depending on size, number and type of accounts, and for family members.

The fee for the Schwab automated investment Program described above is 0.50% annually of the assets under management. As described in *Item 4 Advisory Business*, clients do not pay fees to SPT or brokerage commissions or other fees to CS&Co. as part of the Program. Schwab does receive other revenues, including (i) the profit earned by Charles Schwab Bank, a Schwab affiliate, on the allocation to the Schwab Intelligent Portfolios Sweep Program described in the Schwab Intelligent Portfolios Sweep Program Disclosure Statement; (ii) investment advisory and/or administrative service fees (or unitary fees) received by Charles Schwab Investment Management, Inc., a Schwab affiliate, from Schwab ETFsTM, Schwab Funds[®] and Laudus Funds[®] that we select to buy and hold in the client's brokerage account; (iii) fees received by Schwab from third-party ETFs that participate in the Schwab ETF OneSourceTM program and mutual funds in the Schwab Mutual Fund Marketplace[®] (including certain Schwab Funds and Laudus Funds) in the client's brokerage account for services Schwab provides; and (iv) remuneration Schwab may receive from the market centers where it routes ETF trade orders for execution. Brokerage arrangements are further described below in *Item 12 Brokerage Practices*.

Clients may pay Halter Ferguson Financial fees directly. Fees may also be directly deducted from the client's custodian account. Halter Ferguson Financial does not and will not have physical custody of client funds or securities.

In addition to the fee paid directly to Halter Ferguson Financial, the client will pay fees for custodial services, and for brokerage and other costs associated with client account transactions. Custodial fees vary by the size of the account and account type. Brokerage and other transactions costs also vary based on the level of account activity. Halter Ferguson Financial may recommend that clients establish brokerage accounts with the Schwab Institutional division of Charles Schwab & Co., Inc. (Schwab), a registered broker-dealer, member SIPC, to maintain custody of clients' assets and to effect trades for their accounts. For Halter Ferguson Financial client accounts maintained in its custody, Schwab generally does not charge separately for custody but is compensated by account holders through transaction-related fees for securities trades that are executed through Schwab or that settle into Schwab accounts. Clients may also incur other fees and costs. If client assets are invested in mutual funds, the client will

pay indirectly to the mutual fund company management and other fees for those funds (the mutual fund fees are described in the funds' prospectuses). If a separate account manager is retained for a client's account, the client will also be responsible for paying directly to any separate account manager (and the custodian of that account) any separate account fees required for that account. Separate account fees vary by the size of the account and type of account, and will be disclosed to the client. The services may cost the client more or less than purchasing such services separately depending upon account fees, trading costs, and/or active management fees.

Clients will incur brokerage and other transaction costs. Please see Section XII for more information about Halter Ferguson Financial's brokerage practices.

SELECTION AND MONITORING OF THIRD-PARTY MONEY MANAGERS

We also offer advisory management services to our clients through our Selection and Monitoring of Third-Party Money Managers programs (hereinafter, "Programs").

We provide the client with an asset allocation strategy developed through personal discussions in which goals and objectives based on the client's particular circumstances are established.

Based on the client's individual circumstances and needs we will then perform management searches of various unaffiliated registered investment advisers to identify which registered investment adviser's portfolio management style is appropriate for that client. Factors considered in making this determination include account size, risk tolerance, the opinion of each client and the investment philosophy of the selected registered investment adviser. Clients should refer to the selected registered investment adviser's Firm Brochure or other disclosure document for a full description of the services offered. We are available to meet with clients on a regular basis, or as determined by the client, to review the account.

We monitor the performance of the selected registered investment adviser(s). If we determine that a particular selected registered investment adviser(s) is not providing sufficient management services to the client, we may suggest that the client contract with a different registered investment adviser and/or program sponsor. Under this scenario, we assist the client in selecting a new registered investment adviser and/or program. However, any move to a new registered investment adviser and/or program is solely at the discretion of the client.

Item 6: Performance-Based Fees and Side-By-Side Management

We do not charge performance-based fees nor do we engage in side-by-side management.

Item 7: Types of Clients

Halter Ferguson Financial provides financial planning and investment advice to individuals, families, small businesses, trusts, charitable organizations and profit sharing plans. Portfolio management clients must initiate an account with a minimum deposit of \$200,000. There is no requirement to maintain a minimum account balance, but the minimum portfolio management fee is \$500 dollars per quarter. All fees and minimums are negotiable depending on size, number and type of accounts, and for family members.

Clients eligible to enroll in the Program include individuals, IRAs, and revocable living trusts. Clients that are organizations (such as corporations and partnerships) or government entities, and clients that are subject to the Employee Retirement Income Security Act of 1974, are not eligible for the Program. The minimum investment required to open an account in the Program is \$5,000. The minimum account balance to enroll in the tax-loss harvesting feature is \$50,000.

Item 8: Methods of Analysis, Investment Strategies and Risk of Loss

Fundamental analysis is the primary method used to select investments. Halter Ferguson Financial follows the market on a regular basis and does a significant amount of reading and research to form an overall view of the market. Research resources include in-house research and various independent analysis reports and reporting services. Analysis also includes interpretation of indicators that are related to market sentiment (bullishness, bearishness, money flows). Halter Ferguson Financial uses these views to aid in determining an initial asset allocation. Market expectations are then merged with client objectives and risk tolerance to create a strategic asset allocation.

After developing an Investment Policy Statement with the client, the Advisor is given written authority (Investment Management Agreement) by the client to buy and sell securities on behalf of the client within the stated parameters of the Investment Policy Statement. The Investment Policy Statement can be changed to reflect changes in the client's objectives and risk tolerance. Diversification of investments based on the client's objectives will be part of the recommendations. This type of investing utilizes themes to invest for the intermediate to long term. Halter Ferguson Financial invests client dollars and overweight's areas that it believes have favorable risk-return characteristics. Halter Ferguson Financial considers all of client's investments with the goal that the investments work together to either enhance return and/or reduce risk.

Investment recommendations may include mutual funds (including commodity, arbitrage and bond-backed derivative mutual funds), stocks, bonds, notes, bills, separate account managers, publicly traded REITs, options, annuities, certificates of deposit, cash or money market accounts.

Investing in securities involves risk and clients bear the risk of loss on their investments. As part of our investment strategy, we may recommend allocating portions of a client's assets to mutual funds, publicly traded REITs, or separate accounts managed by third party investment managers. Those other independent managers will have total investment discretion over the assets allocated to them. We annually conduct due diligence and monitor the performance on an ongoing basis of the investment vehicles and separate accounts managed by other managers. Nonetheless, they may conduct business with different custodians, banks, brokers, dealers and counterparties than those we utilize. Moreover, we have no direct ability to ensure that those other managers act in accordance with the stated investment policies or objectives of those funds or accounts, or otherwise act in conformity with applicable contractual, legal, regulatory or other standards and restrictions.

Item 9: Disciplinary Information

Not applicable.

Item 10: Other Financial Industry Activities and Affiliations

Not applicable.

Item 11: Code of Ethics, Participation or Interest in Client Transactions and Personal Trading

The Halter Ferguson Financial Code of Ethics is based on the principle that Halter Ferguson Financial owes a fiduciary duty to its clients. As a fiduciary Halter Ferguson Financial will serve its clients' best interests and place those interests ahead of those of Halter Ferguson Financial. Halter Ferguson Financials Code of Ethics is available to any client or prospective client upon request.

Under the Code of Ethics, employees are permitted to invest in securities and other investment products for their own accounts, but may not use their knowledge of clients' portfolio transactions to benefit themselves.

We do not impose a set limit on the amount of trading employees may conduct for their own accounts,

but we require employees to refrain from excessive trading.

Our Code of Ethics requires employees to disclose all personal investments upon hire and at least annually thereafter, report all personal securities transactions at least quarterly, disclose all personal investment accounts, and maintain their personal investment accounts with designated broker-dealer firms. Exceptions may be made for accounts for which the employee does not maintain investment control or participate in the investment decisions. Employees generally must arrange for their brokers to send us duplicate trade confirmations and account statements for their transactions, and must separately report on a quarterly basis any transaction for which a duplicate confirmation was not sent, or which does not appear on an account statement.

Employees' personal securities transactions generally must be approved in advance, subject to certain limited exceptions. Employees are prohibited from acquiring any securities in an initial public offering, while securities may be acquired in a secondary public offering with prior approval. Employees must obtain prior approval before acquiring any security in a private placement or investing in a private investment fund.

Our Code of Ethics requires employees to obtain prior approval to engage in certain outside business activities (such as serving as a director of a private, public or non-profit company). The Code of Ethics also prohibits employees from accepting gifts of material value from clients, vendors, service providers, and counterparties. Halter Ferguson Financial related persons do not buy or sell securities from clients.

Halter Ferguson Financial related persons can purchase or sell for their own account similar or different open-end funds as those purchased for, or recommended to, clients. Because these funds generally are broadly diversified and transact purchases and redemptions at net asset values determined after orders are received, Halter Ferguson Financial does not believe that a transaction by related persons presents any material conflict with client account.

Item 12: Brokerage Practices

The Custodian and Brokers We Use

Halter Ferguson Financial does not maintain physical custody of your assets that we manage, although are deemed to have custody of your assets if you give us authority to withdraw assets from your account. Your assets must be maintained in an account at the "qualified custodian," generally a broker-dealer or bank. We typically recommend that our clients use Charles Schwab & Co., Inc. (Schwab), a registered broker-dealer, member SIPC, as the qualified custodian. We are independently owned and operated and are not affiliated with Schwab. Schwab will hold your assets in a brokerage account and buy and sell securities when we or you instruct them to.

While we recommend that you use Schwab as custodian/broker, you will decide whether to do so and will open your account with Schwab by entering into an account agreement directly with them. We do not open the account for you, although we may assist you in doing so. Even though your account is maintained at Schwab, we can still use other brokers to execute trades for your account as described below (see *"Your Brokerage and Custody Costs"*).

How We Select Brokers/Custodians

We seek to recommend a custodian/broker who will hold your assets and execute transactions on terms that are, overall, most advantageous when compared to other available providers and their services. We consider a wide range of factors, including, among others:

- Combination of transaction execution services and asset custody services (generally without a separate fee for custody)
- Capability to execute, clear, and settle trades (buy and sell securities for your account)

- Capability to facilitate transfers and payments to and from accounts (wire transfers, check requests, bill payment, etc.)
- Breadth of available investment products (stocks, bonds, mutual funds, exchange-traded funds [ETFs], etc.)
- Availability of investment research and tools that assist us in making investment decisions
- Quality of services
- Competitiveness of the price of those services (commission rates, margin interest rates, other fees, etc.) and willingness to negotiate the prices
- Reputation, financial strength, and stability
- Prior service to us and our other clients
- Availability of other products and services that benefit us, as discussed below (see *“Products and Services Available to Us From Schwab”*)

Your Brokerage and Custody Costs

For our clients’ accounts that Schwab maintains, Schwab generally does not charge you separately for custody services but is compensated by charging you commissions or other fees on trades that it executes or that settle into your Schwab account. For some accounts, Schwab may charge you a percentage of the dollar amount of assets in the account in lieu of commissions. Schwab’s commission rates and asset-based fees applicable to our client accounts were negotiated based on the condition that our clients collectively maintain a total of at least \$10 million of their assets in accounts at Schwab. This commitment benefits you because the overall commission rates or asset-based fees you pay are lower than they would be otherwise.

In addition to transaction-related fees or asset-based fees, Schwab charges you a flat dollar amount as a “prime broker” or “trade away” fee for each trade that we have executed by a different broker-dealer but where the securities bought or the funds from the securities sold are deposited (settled) into your Schwab account. These fees are in addition to the transaction-related fees or other compensation you pay the executing broker-dealer. Because of this, in order to minimize your trading costs, we have Schwab execute most trades for your account. We have determined that having Schwab execute most trades is consistent with our duty to seek “best execution” of your trades. Best execution means the most favorable terms for a transaction based on all relevant factors, including those listed above (see *“How We Select Brokers/Custodians”*).

Products and Services Available to Us From Schwab

Schwab Advisor Services™ (formerly called Schwab Institutional®) is Schwab’s business serving independent investment advisory firms like us. They provide us and our clients with access to its institutional brokerage—trading, custody, reporting, and related services—many of which are not typically available to Schwab retail customers. Schwab also makes available various support services. Some of those services help us manage or administer our clients’ accounts; while others help us manage and grow our business. Schwab’s support services generally are available on an unsolicited basis (we don’t have to request them) and at no charge to us as long as our clients collectively maintain a total of at least \$10 million of their assets in accounts at Schwab. If our clients collectively have less than \$10 million in assets at Schwab, Schwab may charge us quarterly service fees of \$1,200. Following is a more detailed description of Schwab’s support services:

Services That Benefit You

Schwab’s Institutional brokerage services include access to a broad range of investment products, execution of securities transactions, and custody of client assets. The investment products available through Schwab include some to which we might not otherwise have access or that would require a significantly higher minimum initial investment by our clients. Schwab’s services described in this paragraph generally benefit you and your account.

Services That May Not Directly Benefit You

Schwab also makes available to us other products and services that benefit us but may not directly benefit you or your account. These products and services assist us in managing and administering our clients' accounts. They include investment research, both Schwab's own and that of third parties. We may use this research to service all or a substantial number of our clients' accounts, including accounts not maintained at Schwab. In addition to investment research, Schwab also makes available software and other technology that:

- Provide access to client account data (such as duplicate trade confirmations and account statements)
- Facilitate trade execution and allocate aggregated trade orders for multiple client accounts
- Provide pricing and other market data
- Facilitate payment of our fees from our clients' accounts
- Assist with back-office functions, recordkeeping, and client reporting

Services That Generally Benefit Only Us

Schwab also offers other services intended to help us manage and further develop our business enterprise. These services include:

- Educational conferences and events
- Consulting on technology, compliance, legal, and business needs
- Publications and conferences on practice management and business succession
- Access to employee benefits providers, human capital consultants, and insurance providers

Schwab may provide some of these services itself. In other cases, it will arrange for third-party vendors to provide the services to us. Schwab may also discount or waive its fees for some of these services or pay all or a part of a third party's fees. Schwab may also provide us with other benefits, such as occasional business entertainment of our personnel.

Our Interest in Schwab's Services

The availability of these services from Schwab benefits us because we do not have to produce or purchase them. We don't have to pay for Schwab's services so long as our clients collectively keep a total of at least \$10 million of their assets in accounts at Schwab. Beyond that, these services are not contingent upon us committing any specific amount of business to Schwab in trading transaction-related fees or assets in custody. The \$10 million minimum may give us an incentive to recommend that you maintain your account with Schwab, based on our interest in receiving Schwab's services that benefit our business rather than based on your interest in receiving the best value in custody services and the most favorable execution of your transactions. This is a conflict of interest. We believe, however, that our selection of Schwab as our primary custodian and broker is in the best interest of our clients. Our selection is primarily supported by the scope, quality, and price of Schwab's services (*see "How We Select Brokers/Custodians"*) and not Schwab's services that benefit only us. We have in excess of \$100 million in client assets under management, and we do not believe that recommending our clients to collectively maintain at least \$10 million of those assets at Schwab in order to avoid paying Schwab quarterly service fees presents a material conflict of interest.

Client accounts enrolled in the Program are maintained at, and receive the brokerage services of, CS&Co., a broker-dealer registered with the Securities and Exchange Commission and a member of FINRA and SIPC. While clients are required to use CS&Co. as custodian/broker to enroll in the Program, the client decides whether to do so and opens its account with CS&Co. by entering into a brokerage account agreement directly with CS&Co. We do not open the account for the client. If the client does not wish to place his or her assets with CS&Co., then we cannot manage the client's account through the Program. CS&Co. may aggregate purchase and sale orders for Funds across accounts enrolled in the Program, including both accounts for our clients and accounts for clients of other independent investment advisory firms using the Platform.

Schwab Advisor Services™ (formerly called Schwab Institutional) is Schwab's business serving independent investment advisory firms like us. Through Schwab Advisor Services, CS&Co. provides us and our clients, both those enrolled in the Program and our clients not enrolled in the Program, with access to its institutional brokerage services— trading, custody, reporting, and related services—many of which are not typically available to CS&Co. retail customers. CS&Co. also makes available various support services. Some of those services help us manage or administer our clients' accounts, while others help us manage and grow our business. CS&Co.'s support services described below are generally available on an unsolicited basis (we don't have to request them) and at no charge to us. The availability to us of CS&Co.'s products and services is not based on us giving particular investment advice, such as buying particular securities for our clients. Here is a more detailed description of CS&Co.'s support services:

CS&Co.'s institutional brokerage services include access to a broad range of investment products, execution of securities transactions, and custody of client assets. The investment products available through Schwab include some to which we might not otherwise have access or that would require a significantly higher minimum initial investment by our clients. CS&Co.'s services described in this paragraph generally benefit the client and the client's account.

CS&Co. also makes available to us other products and services that benefit us but may not directly benefit the client or its account. These products and services assist us in managing and administering our clients' accounts. They include investment research, both Schwab's own and that of third parties. We may use this research to service all or some substantial number of our clients' accounts, including accounts not maintained at CS&Co. In addition to investment research, CS&Co. also makes available software and other technology that:

- provide access to client account data (such as duplicate trade confirmations and account statements);
- facilitate trade execution and allocate aggregated trade orders for multiple client accounts;
- provide pricing and other market data;
- facilitate payment of our fees from our clients' accounts; and
- assist with back-office functions, recordkeeping, and client reporting.

CS&Co. also offers other services intended to help us manage and further develop our business enterprise. These services include:

- educational conferences and events;
- technology, compliance, legal, and business consulting;
- publications and conferences on practice management and business succession; and
- access to employee benefits providers, human capital consultants, and insurance providers.

CS&Co. may provide some of these services itself. In other cases, it will arrange for third-party vendors to provide the services to us. CS&Co. may also discount or waive its fees for some of these services or pay all or a part of a third party's fees. CS&Co. may also provide us with other benefits such as occasional business entertainment of our personnel.

The availability of services from CS&Co. benefits us because we do not have to produce or purchase them. We don't have to pay for these services, and they are not contingent upon us committing any specific amount of business to CS&Co. in trading commissions or assets in custody. With respect to the Program, as described above under *Item 4 Advisory Business*, we do not pay SPT fees for the Platform so long as we maintain \$100 Million in client assets in accounts at CS&Co. that are *not* enrolled in the Program. In light of our arrangements with Schwab, we may have an incentive to recommend that our clients maintain their accounts with CS&Co. based on our interest in receiving Schwab's services that benefit our business rather than based on the client's interest in receiving the best value in custody services and the most favorable execution of transactions. This is a conflict of interest. We believe, however, that our selection of CS&Co. as custodian and broker is in the best interests of our clients. It is

primarily supported by the scope, quality, and price of CS&Co.'s services and not Schwab's services that benefit only us.

If we make a trade error that results in a loss to a client, we will make the client whole. If we make a trade error that results in a gain to a client and the gain cannot be attributable to a particular client, Schwab, and not us, keeps the gain. In that case, if the gain is more than \$100, Schwab will donate the gain to charity. If the gain is less than \$100, Schwab will keep the gain to minimize and offset its administrative time and expense.

We also use other custodians as requested by the client, which could result in the client paying more in custodial fees and transaction charges. For example, a client that trades at a custodian other than Schwab may not be able to participate in an aggregated trade.

Item 13: Review of Accounts

Managed Accounts – All client accounts are reviewed at least quarterly, and a written report is issued to all clients about 10 days following the end of a quarter. Clients may elect in writing to receive their reports electronically. In addition to quarterly review, client accounts are reviewed and adjusted by the investment advisors as economic, market conditions and fund portfolio managers change. Client meetings and phone consultations to review the client's account activity are included in the service for investment management clients. At least an annual review meeting or phone conference is recommended but not required. Principal Bradford S. Ferguson, CFA is accountable for providing these services.

Item 14: Client Referrals and Other Compensation

Halter Ferguson Financial does not directly or indirectly compensate any person for client referrals. Halter Ferguson Financial is a fee only firm and is not compensated by any person or firm who provides advisory services to our clients.

We receive an economic benefit from Schwab in the form of the support products and services it makes available to us. These products and services, how they benefit us, and the related conflicts of interest are described above under *Item 12 Brokerage Practices*. The availability to us of Schwab's products and services is not based on us giving particular investment advice, such as buying particular securities for our clients.

Item 15: Custody

Under government regulations, we are deemed to have custody of a client's assets if the client authorizes us to instruct CS&Co. to deduct our advisory fees directly from the client's account. This is the case for accounts in the Program. CS&Co. maintains actual custody of clients' assets. Clients receive account statements directly from CS&Co. at least quarterly. They will be sent to the email or postal mailing address the client provides to CS&Co. Clients should carefully review those statements promptly when received. We also urge clients to compare CS&Co.'s account statements to the periodic account statements clients receive from us.

Halter Ferguson Financial does not have physical custody of client funds or securities. If there is any activity in a client account, clients receive monthly statements from the account custodian. If there is no activity in a client account, clients receive quarterly statements from the account custodian. Clients should carefully review those statements. Halter Ferguson Financial sends quarterly statements about 10 days following the end of a quarter. In addition to showing client holdings and value of the client account at the end of the quarter, the report contains the billing for the management fee. Clients should compare the account statements they receive from Halter Ferguson Financial with those they receive from the custodian. The account custodian does not calculate nor verify the accuracy of the

advisory fee calculation. Clients may have standing letters of authorization on their accounts. The Firm has reviewed those relationships and determined that they meet the IAA no action letter seven conditions and do not trigger the surprise custody audit.

Item 16: Investment Discretion

Clients who engage Halter Ferguson Financial for portfolio management services enter into an Investment Management Agreement with Halter Ferguson Financial. This agreement gives Halter Ferguson Financial discretion over their accounts. Discretion means Halter Ferguson Financial can buy and sell securities, and terminate separate accounts, without consulting with the client. Clients may impose in writing restrictions on investing in certain securities, types of securities or the sale of securities presently owned by the client. This should be done in writing at the time the client signs the Investment Policy Statement. The Investment Management Agreement can be cancelled by the client or by Halter Ferguson Financial by giving 30 days written notice.

Item 17: Voting Client Securities

As provided in Schwab's account application the client does not appoint the investment advisor voting authority. The advisor does not vote proxies for the client. The client is responsible for all issuer and issuer-related communications (proxies, tender offers, proposed mergers, rights offerings, exchange offers and warrants, among other things) that may require a voting decision or other action regarding investments held in your account. The custodian will send all issuer and issuer-related communications directly to the client. The client will be responsible for providing the custodian any applicable instructions or directions on those items. If requested by the client, the advisor will provide advice on those actions that directly affect the client's holdings, but will not provide advice on proxy voting.

Item 18: Financial Information

Halter Ferguson does not require or solicit prepayment of more than \$1,200 in fees six months or more in advance. Halter Ferguson does not have any adverse financial information to disclose.

Confidentiality

Protecting client privacy is very important to Halter Ferguson. Halter Ferguson views protecting its clients' private information as a top priority. Pursuant to the requirements of the Gramm-Leach-Bliley Act, Halter Ferguson has instituted policies and procedures to ensure that customer information is kept private and secure. Halter Ferguson does not disclose any non-public personal information about its clients or former clients to any nonaffiliated third parties, except as permitted by law. In the course of servicing a client account, Halter Ferguson may share some information with its service providers, such as, but not limited to, transfer agents, custodians, broker/dealers, accountants, and lawyers.

Halter Ferguson restricts internal access to non-public personal information about its clients to those employees who need to know that information in order to provide products or services to the client. Halter Ferguson maintains physical and procedural safeguards that comply with federal standards to guard a client's non-public personal information and ensure its integrity and confidentiality. As emphasized above, it has always been and will always be Halter Ferguson's policy never to sell information about current or former customers or their accounts to anyone. It is also Halter Ferguson's policy not to share information unless required to process a transaction, at the request of Halter Ferguson customer, or as required by law.

A copy of Halter Ferguson's privacy policy notice will be provided to each client prior to, or contemporaneously with, the execution of the advisory agreement. Thereafter, Halter Ferguson will deliver a copy of the current privacy policy notice to its clients prior to changing its sharing practices.

Item 1: Cover Page

Bradford S. Ferguson

Halter Ferguson Financial, Inc.

7702 Woodland Drive, Suite 150

Indianapolis, Indiana 46278

317-875-0202

<http://www.hffinancial.com>

CRD number: 5062898

March 12, 2020

This brochure supplement provides information about Bradford S. Ferguson that supplements the Halter Ferguson Financial brochure. You should have received a copy of that brochure. Please contact Bradford S. Ferguson, Chief Compliance Officer if you did not receive Halter Ferguson Financial's brochure or if you have questions about the contents of this supplement

Additional information about Bradford S. Ferguson is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2: Education and Background

Bradford S. Ferguson, CFA

Year of Birth: 1976

EDUCATION

Northwestern University, Evanston, IL, 1999, B.A. Statistics & Economics. CFA Institute, Charlottesville, NC, obtained Chartered Financial Analyst Charter 2006.

BUSINESS BACKGROUND

Halter Ferguson Financial, April 2005 to Present.

The Chartered Financial Analyst (CFA) charter is a globally respected, graduate-level investment credential established in 1962 and awarded by CFA Institute — the largest global association of investment professionals. There are currently more than 90,000 CFA charterholders working in 135 countries. To earn the CFA charter, candidates must: 1) pass three sequential, six-hour examinations; 2) have at least four years of qualified professional investment experience; 3) join CFA Institute as members; and 4) commit to abide by, and annually reaffirm, their adherence to the CFA Institute Code of Ethics and Standards of Professional Conduct.

High Ethical Standards

The CFA Institute Code of Ethics and Standards of Professional Conduct, enforced through an active professional conduct program, require CFA charterholders to:

- Place their clients' interests ahead of their own
- Maintain independence and objectivity
- Act with integrity
- Maintain and improve their professional competence
- Disclose conflicts of interest and legal matters

Global Recognition

Passing the three CFA exams is a difficult feat that requires extensive study (successful candidates report spending an average of 300 hours of study per level). Earning the CFA charter demonstrates mastery of many of the advanced skills needed for investment analysis and decision making in today's quickly evolving global financial industry. As a result, employers and clients are increasingly seeking CFA charterholders—often making the charter a prerequisite for employment. Additionally, regulatory bodies in 19 countries recognize the CFA charter as a proxy for meeting certain licensing requirements, and more than 125 colleges and universities around the world have incorporated a majority of the CFA Program curriculum into their own finance courses.

Comprehensive and Current Knowledge

The CFA Program curriculum provides a comprehensive framework of knowledge for investment decision making and is firmly grounded in the knowledge and skills used every day in the investment profession. The three levels of the CFA Program test a proficiency with a wide range of fundamental and advanced investment topics, including ethical and professional standards, fixed-income and equity analysis, alternative and derivative investments, economics, financial reporting standards, portfolio management, and wealth planning.

The CFA Program curriculum is updated every year by experts from around the world to ensure that candidates learn the most relevant and practical new tools, ideas, and investment and wealth management skills to reflect the dynamic and complex nature of the profession. To learn more about the CFA charter, visit www.cfainstitute.org.

Item 3: Disciplinary Information

Not applicable.

Item 4: Other Business Activities

Not applicable.

Item 5: Additional Compensation

Not applicable.

Item 6: Supervision

Only the firm professionals Bradford S. Ferguson, CFA and Tiffany White, CFP®, provide advice to clients. Bradford S. Ferguson, CFA, President is responsible for all supervision. His phone number is 317-875-0202. As part of this role, Mr. Bradford Ferguson does quarterly spot checks of financial plans and investment reviews being presented to each client. Mr. Bradford Ferguson reviews all written client performance materials and newsletters prior to use. On a regular basis, the team meets to discuss investment strategies and market conditions.

Item 1: Cover Page

Tiffany White

Halter Ferguson Financial, Inc.

7702 Woodland Drive, Suite 150

Indianapolis, Indiana 46278

317-875-0202

<http://www.hffinancial.com>

CRD number: 6435426

March 12, 2020

This brochure supplement provides information about Tiffany White that supplements the Halter Ferguson Financial brochure. You should have received a copy of that brochure. Please contact Bradford S. Ferguson, Chief Compliance Officer if you did not receive Halter Ferguson Financial's brochure or if you have questions about the contents of this supplement

Additional information about Tiffany White is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2: Education and Background

Tiffany White, CFP®

Year of Birth: 1981

EDUCATION

DePauw University, Greencastle, IN 2003, B.A. Economics.

The American College of Financial Services, Bryn Mawr, PA 2010, CFP® Certification Curriculum.

CFP® Certification earned 2014.

BUSINESS BACKGROUND

Halter Ferguson Financial, May 2007 to Present, Financial Planner

In order to achieve and maintain certification, CFP® professionals must: 1) pass the comprehensive CFP® Certification Examination, 2) pass the CFP Board's Fitness Standards for Candidates and Registrants, 3) agree to abide by CFP Board's Code of Ethics and Professional Responsibility and Rules of Conduct which put clients' interests first, 4) comply with the Financial Planning Practice Standards which spell out what clients should be able to reasonably expect from the financial planning engagement, and 5) complete 30 hours of continuing education (including 2 hours of approved Ethics CE) every two years. - See more at: <http://www.cfp.net/become-a-cfp-professional/cfp-certification-requirements#sthash.qwXJz3yF.dpuf>.

Item 3: Disciplinary Information

Not applicable.

Item 4: Other Business Activities

Not applicable.

Item 5: Additional Compensation

None.

Item 6: Supervision

Only the firm professionals Bradford S. Ferguson, CFA and Tiffany White, CFP®, provide advice to clients. Bradford S. Ferguson, CFA, President is responsible for all supervision. His phone number is 317-875-0202. As part of this role, Mr. Bradford Ferguson does quarterly spot checks of financial plans and investment reviews being presented to each client. Mr. Bradford Ferguson reviews all written client performance materials and newsletters prior to use. On a regular basis, the team meets to discuss investment strategies and market conditions.